

NATIONAL METAL FINISHING STRATEGIC GOALS PROGRAM INDIANA IMPLEMENTATION PLAN FOR 2001-2002

I. INTRODUCTION

Indiana is one (1) of **twenty-one** (21) states participating in the national metal finishing industry and USEPA Metal Finishing Strategic Goals Program (SGP). The SGP is designed to promote cleaner, cheaper and smarter environmental protection by the metal finishing industry and establishes a set of voluntary performance goals with target dates of 2002. These facility-based goals represent “better than compliance” environmental performance allowing the metal finishing industry to substantially reduce pollution from their operations. The Goals Program is aiming for 100% compliance across the industry, and having 80% of firms reach the facility-specific targets. Background information regarding the SGP may be found at www.state.in.us/idem/strategicgoals.

As of June 6, 2001, a total of twenty-one (21) Indiana metal finishing facilities and ten (10) publicly owned treatment works (POTWs) have signed on to the Goals Program. A listing of these participating facilities/POTWs can be found at the IDEM SGP web site noted above. By signing on to the Goals Program, these metal finishing facilities have voluntarily committed to making a good faith effort toward achieving the National Performance Goals outlined below.

II. METAL FINISHING NATIONAL PERFORMANCE GOALS

FACILITY-BASED GOALS (1-3)

Goal 1: Improved Resource Utilization

- 98% of metals ultimately utilized.
- 50% reduction in water purchased and used.
- 25% reduction in facility-wide energy use.

Goal 2: Reduced Hazardous Emissions and Exposures

- 90% reduction in organic TRI chemicals and a 50% reduction in metals, emitted to air and water.
- 50% reduction in land disposal of hazardous sludges and a reduction in the generation of sludges.
- Reduction in human exposure to toxic materials in the facility and the surrounding community.

Goal 3: Increased Economic Pay backs and Decreased Compliance Costs

- Long-term economic benefit to facilities achieving Goals 1 and 2.
- 50% reduction in costs of unnecessary permitting, reporting, monitoring, and related activities (from 1992 levels).

INDUSTRY-WIDE GOALS (4 and 5)

Goal 4: Industry-Wide Achievement of Goals Relating to Individual Facilities

Goal 5: Industry-Wide Compliance with Environmental Performance Requirements

- All operating facilities achieve compliance with Federal, state, and local environmental performance requirements.
- All metal finishers that wish to cease operations have access to a government sponsored “exit strategy” for environmentally responsible site transition.
- All enforcement activities are conducted in a consistent manner to achieve a level playing field.

III. INDIANA IMPLEMENTATION PLAN AND SCHEDULE

Based on a series of stakeholder meetings held on November 19, 1998; March 31, May 27, August 25, and December 9, 1999; April 14, July 20, and October 19, 2000; January 25, and May 3, 2001, the following DRAFT implementation plan update for 2001-2002 has been developed, subject to future ongoing revision and quarterly updates:

METAL FINISHER and RCRA WORKGROUP RESPONSIBILITIES:

Action Plan	Due Date/STATUS	Person(s) Responsible	Note(s)
1. Prepare requests for variances from classification as a solid waste in accordance with 40 CFR 260.30 and 40 CFR 260.31; and/or “delisting.”	Submission forthcoming from Sumco in late 2000. <u>STATUS:</u> Completed – submission received by IDEM on 12/18/00.	Interested companies in cooperation with Gary Romesser/ IDEM and Mark Sutton/HH Sumco (RCRA Workgroup).	HH Sumco submitted a solid waste variance request to IDEM for approval in December 2000. RCRA Workgroup members are reviewing the request and will make comments by the end of January 2001. RCRA workgroup will assist interested SGP metal finishers in pursuing variance requests or delisting petitions. Any companies interested in pursuing a variance request or delisting petition are urged to contact Gary Romesser of IDEM’s RCRA Program. HH Sumco submittal can serve as a model for other interested metal finishers. Workgroup encountering regulatory barriers (RCRA) as they work to develop the variance request proposal (i.e., lack of state-to-state reciprocity). Since the federal RCRA program is delegated to individual states, EPA is unable to grant national reciprocity among the states. Therefore, companies seeking variances and delistings must submit requests to each individual state in which the waste is first generated, passes through, and is ultimately transported to.
2. Once IDEM-RCRA has received authorization for F006 delisting, RCRA Workgroup to assist in developing guidelines for fast-tracking requests and reviews.	Ongoing - as delisting petitions received.	Gary Romesser and Dave Berrey/RCRA	Delisting authorization received by IDEM effective Jan. 4, 2001. Dave Berrey is preparing list of procedures for fast-tracking reviews of “variance” and “delisting” requests at IDEM. Mark Sutton will prepare guidance for SGP participants to use when submitting requests. Mark is also available for questions or assistance if any SGP company wants to pursue a variance. The procedures and guidance will be reviewed for comment by the workgroup in June 2001 and submitted at the next full stakeholder’s meeting.
3. Document and explore options for segregating wastestreams/ sludges in order to reduce volume of sludges regulated as hazardous waste (e.g., F006). The ultimate objective is to produce sludges with high-metal content (for reclamation) or sludges which could be delisted or treated to become non-hazardous.	Ongoing Current status (of the list): draft list; further development is on hold.	RCRA Workgroup (Mark Stoddard/Ted Heemstra)	Need to look at possible regulatory relief for legitimate recycling operations (possibly through ion exchange units). Workgroup developing a list of information (list of recyclers) to enable the metal finisher to find the best option for the recycling of waste (i.e., sludges) that cannot otherwise be used in process or reduced/eliminated through pollution prevention. Ted Heemstra will be working with Mark Stoddard to include additional information based on input (questionnaire to be developed) from metal finishers. The draft list will be revised and reformatted. Afterwards, it will be distributed among the stakeholders for additional comment.

Action Plan	Due Date	Person(s) Responsible	Note(s)
4. Recruit more metal finishers to officially sign on to SGP.	Ongoing	Jerry Phillips, on behalf of AESF, in cooperation with Shayla Barrett/CMTI, Coventry Group & Global Environment Technology Foundation (new EPA contractor).	Workgroup includes Jerry Phillips, Shayla Barrett, Nancy Norton, and Cheryl Carlson. Workgroup to: - look at 413 and 433 list compiled by Alice Smith/CMTI. - focus on areas where either metal finishers/POTWs already signed on.
5. Pursue assessments/audits in order to benchmark individual metal finisher's current status for: - energy usage, emissions, and wastes - capital improvement opportunities - compliance status	In progress as most SGP metal finishers have already contacted CMTI and have received annual industry report cards.	All SGP metal finishers in cooperation with CMTI and IDEM/OPPTA.	Note availability of IDEM's <i>Self-disclosure and Environmental Audit Policy</i> as published in 5/1/99 <u>Indiana Register</u> . Copies are available by contacting CMTI or OPTTA. Document may also be downloaded from www.state.in.us/ide/oe/nrp/self.html . IDEM provides RCRA guidance documents on their website and will have some handouts available at the May stakeholder meeting (e.g., non-rule policy document for F006 recycled wastes: allowing LQQs 180 days/270 days accumulation, RCRA satellite accumulation areas, changes to manifest requirements). IDEM's information for business and industry web page is http://www.state.in.us/ide/busind.html .
6. Explore P2, waste treatment and segregation options, and/or technology transfer/process changes to make progress in achieving facility-based goals.	2001 - 2002 Ongoing	All SGP metal finishers in cooperation with Shayla Barrett/CMTI and RCRA Workgroup	To be presented and discussed during quarterly stakeholder meetings as a standing agenda item eligible for wastewater continuing education credits. Various options will depend on process needs for recycling/reclamation.

POTW RESPONSIBILITIES:

Action Plan	Due Date	Person(s) Responsible	Note(s)
1. Pursue local ordinance revisions for sampling, recordkeeping, reporting changes for SGP metal finishers making incremental progress in achieving the performance goals.	Pursue in South Bend – 3 rd Quarter '00. Current status unknown. Due to scheduling conflicts, Cheri Storms has been unable to meet with POTW reps. re: incentives for the 5-Star Program. Trying to schedule a meeting by June 1, 2001.	Ken Zmudzinski/South Bend POTW, Sue Claussen/Michigan City POTW, and Bill Blue/IDEM in cooperation with Metal Finishing 5-Star Recognition Program - Cheri Storms/IDEM	POTW workgroup to research, seek guidance from EPA HQ &/or other states, and lead development of proposed language amendments POTWs can use to incorporate SGP flexibility within their local programs. Model language provided by Claudio Ternieden of EPA HQ. Flexibility can be tied to various performance criteria and offered for good performers thru 5-Star Metal Finishing Environmental Recognition Program.
2. Recruitment of POTWs & local metal finishers & electroplaters - seek assistance of IDEM in educating local officials and metal finishers & electroplaters about benefits of SGP participation, - signed on, but not the municipality/POTW (including “hybrid” cities.)	Continue local efforts in 2001. Ongoing along with assistance of ad hoc Recruitment Workgroup formed 8/25/99.	Sue Claussen/Michigan City in cooperation with IDEM and Jerry Phillips-lead for Recruitment Workgroup	City of Kokomo signed on in December 2000.
3. Provide written comments to EPA on the proposed Metal Products and Machinery Effluent Guidelines during the public comment period which ends July 2, 2001.	Share written comments with full stakeholder group and submit to EPA by end of the public comment period, July 2, 2001.	Sue Claussen/Michigan City	Nancy Norton/Imagineering to assist subcommittee of the IWPCA Municipal Pretreatment Committee in the preparation of written comments to EPA. Present written comments to full state stakeholder group at May 3 , 2001 SGP meeting.

EPA REGION 5 RESPONSIBILITIES:

Action Plan	Due Date	Person(s) Responsible	Note(s)
1. Assist IDEM in developing system to expedite processing of F006 delisting/variance requests submitted by SGP metal finishers	As received Completed.	Greg Czajkowski, EPA Region 5	IDEM received delisting authority from EPA Region 5 effective 1-4-01.
2. Share information on wastestream/sludge segregation to IDEM, SGP RCRA Workgroup, and CMTI.	Ongoing	Greg Czajkowski, EPA Region 5	
3. Look into the issue of the lack of state reciprocity for variances (relevant to recycling F006 to smelters/recyclers) and delistings. Consider whether EPA Region 5 can assist since 5 out of 6 states in Reg. 5 have signed on to SGP.	Completed	Greg Czajkowski, EPA Region 5	The EPA position on reciprocity, as communicated by EPA staff to the RCRA workgroup, is that EPA cannot provided for state reciprocity on variances since these programs have been delegated to the Region 5 states. Reciprocity agreements must be worked out between individual states. EPA could assist with the individual state agreements if that would be helpful.
4. Work, in conjunction with EPA Headquarters, to provide information on ion exchange systems and encourage proposed RCRA regulatory relief.	Ongoing	Joan Tanaka and Al Fenedick, EPA Region 5,	The U.S. Filter Project XL pilot project will test the ion exchange system outside of RCRA regulation. Finalization of the project's site specific regulation has been slowed due to the change in administration. All authorizations to conduct the project (revised state permit, final federal rule) should be in place by October 2001.

IDEM RESPONSIBILITIES:

Action Plan	Due Date	Person(s) Responsible	Note(s)
1. IDEM-RCRA to fast-track requests for variances from classification as a solid waste in accordance with 40 CFR 260.30 and 40 CFR 260.31. Also assist in compilation of delisting petitions from interested metal finishers.	As received, anticipate 3-4 month turn-around time for complete variance requests. <u>STATUS:</u> 1 st SW variance request received in Dec. 2000. A 2 nd SW variance has also been received.	Gary Romesser and Dave Berrey/RCRA	RCRA workgroup will assist interested SGP metal finishers in pursuing variance requests or delisting petitions. HH Sumco has submitted variance request to IDEM for approval. Any companies interested in pursuing a variance request or delisting petition are urged to contact Gary Romesser of IDEM's RCRA Program. On 4/17/01, the <u>Indianapolis Star</u> public noticed IDEM's intent to grant HH Sumco's request for an F006 variance. HH Sumco's application and draft approval are available upon request. At the end of the 30 day public comment period, IDEM will evaluate all comments before making a final decision.
2. IDEM-OWQ to provide support, education, & outreach to POTWs as requested or recommended by Recruitment Workgroup.	2000-2001 Ongoing, upon request.	Bill Blue/OWQ	
3. Pursue delegation of pretreatment program to IDEM from EPA.	In process - IDEM is working with EPA Region 5 as they conduct a review of our draft submittal package.	Bill Blue/OWQ	
4. Set date/locations for quarterly stakeholder meetings. Coordinate meetings and provide updates to state SGP implementation plan as required.	Ongoing. Next full stakeholder meeting scheduled for Aug. 23, 2001 from 11 a.m. to 1 p.m. Indy time at 9245 N. Meridian St., Indianapolis.	Debbie Dubenetzky/ IDEM with support and cooperation of CMTI	
5. OPPTA to provide free, confidential technical assistance and technology transfer information to metal finishers.	Available NOW Ongoing, upon request.	Mark Stoddard/ OPPTA in cooperation with Shayla Barrett/CMTI	

6. OPPTA to develop 5-Star Metal Finisher Environmental Recognition Program in accordance with schedule in 6.A thru 6.E below:	Ongoing – program development on track for completion during summer 2001.	Cheri Storms and Dave Wintz	<p>1st draft 5-Star proposal presented at 12/9/99 full stakeholder meeting.</p> <p>2nd draft Performance Ladder proposal distributed and presented at April 14, 2000 stakeholder meeting.</p> <p>3rd draft distributed/revised at Jan. 25, 2001 5-Star workgroup meeting.</p> <p>5-Star workgroup met at Purdue on March 28, 2001 and made additional changes to draft application.</p> <p>At March 29, 2001 P2 for Electroplaters Conference at Purdue, Cheri distributed the draft application and asked current pledge participants to complete the application and let Cheri know if they had any questions, problems, etc. Only 2 folks have responded, and neither encountered any problems with the application.</p> <p>Present to full stakeholder group for comments prior to May 3 full stakeholder meeting.</p>
6.A. Implement pledge program.	January 1, 2000 <u>STATUS</u> : Completed.	Cheri Storms and Dave Wintz	
6.B. Accept pledges.	March 15, 2000 <u>STATUS</u> : Completed.	Cheri Storms and Dave Wintz	
6.C. Implement 5-Star Program.	Summer 2001	Cheri Storms and Dave Wintz	
6.D. Begin marketing 5-Star Program.	Summer 2001	Cheri Storms and Dave Wintz	
6.E. Recognize first round of 5-Star recipients.	March 15, 2002.	Cheri Storms and Dave Wintz	

CLEAN MANUFACTURING TECHNOLOGY AND SAFE MATERIALS INSTITUTE RESPONSIBILITIES:

Action Plan	Due Date	Person(s) Responsible	Note(s)
1. Provide free, confidential technical assistance and technology transfer information to metal finishers.	Available NOW. Ongoing, upon request.	Shayla Barrett/CMTI in cooperation with Mark Stoddard/OPPTA	CMTI's role in the SGP for metal finishers is to: - recruit Indiana metal finishers, - serve as initial contact for metal finishers who have signed on to the SGP. CMTI will welcome the metal finisher to the SGP and offer aid in completing the forms required for baseline information and additional years' information in order to determine the metal finisher's progress towards the SGP goals, - perform an on-site, confidential multimedia environmental assessment to determine whether or not the metal finisher is in regulatory compliance. Aid the metal finisher in becoming compliant if they are not, -perform an on-site, confidential pollution prevention opportunity assessment to determine if opportunities exist for the metal finisher to save money, reduce toxic emissions, and also progress towards the SGP goals, and - provide technical assistance towards the metal finisher achieving the SGP goals.
2. Disseminate general SGP awareness info to metal finishers on CMTI's mailing lists.	Ongoing with future issues of state SGP newsletter.	Shayla Barrett/CMTI, Jerry Phillips/AESF and Debbie Dubenetzky/IDEM	CMTI compiled database of metal finishers subject to either 413 or 433 categorical pretreatment standards.
3. Continue state SGP newsletter.	1 st issue in Nov. '99, 2 nd in April '00, 3 rd in July '00, 4 th in Oct. '00, and 5 th issue in Jan. 2001. Future issues ongoing – 6 th issue in May 2001.	Shayla Barrett/CMTI	Any items of interest for future issues can be forwarded to Shayla Barrett/CMTI. Hope to provide information on electrowinning in August newsletter.
4. Provide info to metal finishers re: pollution prevention options successfully used to attain goals at SGP participants' facilities via quarterly SGP newsletter.	Ongoing in 2001 and 2002.	Shayla Barrett/CMTI in cooperation with Gary Romesser/IDEM, and EPA Reg. 5	CMTI will continue to publish P2 efforts that are helping participants to achieve the goals as they are accomplished and shared.
5. Refer to national data released by EPA following survey to develop national baseline for what constitutes "best industry practices".	Begin July 2000, ongoing.	Shayla Barrett/CMTI	Once individual metal finishing facilities receive their annual facility-based SGP "report cards," CMTI to provide assistance (upon request) to SGP metal finishers pursuing one or more SGP goals. Report cards released in June 2000.

6. Drag-out seminar	<p>Ongoing, beginning 3rd Quarter 2000.</p> <p>Completed unless new participants want them. All current participants that desired a workshop have had them.</p>	Shayla Barrett/CMTI	<p>On-site seminars are being offered free to SGP participants, fee charged for other metal finishers.</p> <p>A total of five seminars have been provided on-site to facilities upon request. Interested companies should contact Shayla.</p> <p>Drag out video and discussion also presented at January 25, 2001 full stakeholder meeting. Application for two wastewater continuing education credits approved in advance for this meeting/presentation.</p>
7. Serve as lead of Emergency Preparedness Workgroup and coordinate meetings as necessary.	Conduct 1 st workgroup meeting by May 3, 2001 full stakeholder meeting.	Dr. Corson and Shayla Barrett/CMTI	<p>H.H. Sumco to serve as “model” facility for this undertaking.</p> <p>Emergency Preparedness template presented at the May 3, 2001 meeting. Comments due back to Dr. Corson by end of July 2001.</p>
8. SGP Environmental Management System (EMS) initiative.	Organize SGP/EMS consortium to assist SGP participants in preparing an EMS. Organize group by May 3, 2001.	Dr. Corson and Shayla Barrett/CMTI CMTI in cooperation with Mark Stoddard/OPPTA/IDEM	<p>Investigate methods to interest CEOs and owners of SGP facilities to incorporate an EMS and options to develop an EMS more efficiently and cheaply.</p> <p>CMTI has visited Kentucky Pollution Prevention Center (KPPC) on April 23, 2001 to discuss exchange of services. KPPC will help organize EMS Initiative in exchange for CMTI helping organize their SGP. Kick-off meeting in the planning.</p>